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6 Attorney for John Burnett  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11

12 Plaintiff,

13 v.

14 JOHN BURNETT,

15 Defendant.

Case No. 2:21-mj-00777-VCF

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING  
(First Request)**

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
18 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 LaRonda R. Martin, Assistant Federal Public Defender, counsel for John Burnett, that the  
21 Preliminary Hearing currently scheduled on October 18, 2021, be vacated and continued to a  
22 date and time convenient to the Court, but no sooner than forty-five (45) days.

23 The Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant needs additional time to review the preliminary  
25 discovery, forthcoming from the government, with Mr. Burnett. The parties are attempting to  
26 negotiate the matter pre-indictment. Counsel for the defendant also needs additional time to  
determine whether there are any pretrial issues that must be litigated, determine whether the

1 case will ultimately go to trial and/or determine whether the matter can be resolved through  
2 negotiations pre-indictment.

3 2. The defendant is not incarcerated and does not object to the continuance.

4 3. The parties agree to the continuance.

5 4. The additional time requested by this stipulation is excludable in computing the  
6 time within which the defendant must be indicted and the trial herein must commence pursuant  
7 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under  
8 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

9 This is the first stipulation to continue filed herein.

10 DATED this 8<sup>th</sup> day of October, 2021.

11 RENE L. VALLADARES  
12 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

13 */s/ LaRonda R. Martin*  
14 By \_\_\_\_\_

*/s/ Bianca R. Pucci*  
By \_\_\_\_\_

15 LARONDA R. MARTIN  
Assistant Federal Public Defender

BIANCA R. PUCCI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 JOHN BURNETT,  
8

9 Defendant.

Case No. 2:21-mj-00777-VCF

**ORDER**

10 IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for  
11 Monday, October 18, 2021 at 4:00 pm, be vacated and continued to November 29, 2021 at the  
12 hour of 4:00 p.m.; or to a time and date convenient to the court.  
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14 DATED this 8th day of October, 2021.

15   
16 UNITED STATES MAGISTRATE JUDGE  
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